

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the
District of Maryland

16-261 OSAG

16-261 1SAG

United States of America

v.

Damion Jordan,
Miles Guest

Case No.

Defendant(s)

FILED ENTERED
LOGGED RECEIVED

OCT 03 2016

CRIMINAL COMPLAINT

AT BALTIMORE
CLERK, U.S. DISTRICT COURT
DISTRICT OF MARYLAND
DEPUTY

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of January 13, 2016 in the county of Baltimore in the
District of Maryland, the defendant(s) violated:

Code Section

18 U.S.C. § 1951

Offense Description

Hobbs Act robbery

This criminal complaint is based on these facts:

See Attached Affidavit

☐ Continued on the attached sheet.

[Signature]
Complainant's signature

Task Force Officer Shane Sammons

Printed name and title

Sworn to before me and signed in my presence.

Date: 10/03/2016

[Signature]
Judge's signature

City and state: Baltimore, Maryland

The Honorable Stephanie A. Gallagher

Printed name and title

USMJ

16-2610SAG

16-2611SAG

AFFIDAVIT IN SUPPORT OF COMPLAINT

I, Shane Sammons, task force officer with the Federal Bureau of Investigation (FBI) being duly sworn, state the following:

PURPOSE OF THE AFFIDAVIT

1. This affidavit is made in support of a criminal complaint and arrest warrant for **DAMION JORDAN** and **MILES GUEST**, for violations of Title 18 U.S.C. § 1951 (Hobbs Act Robbery).

AGENT BACKGROUND

2. I am a Task Force Officer with the Federal Bureau of Investigation (FBI) and have been so since 2011. As such, I am an "investigative or law enforcement officer of the United States" within the meaning of § 2510(7) of Title 18, United States Code (U.S.C.), that is, an officer of the United States empowered by law to conduct investigations of and to make arrests for offenses enumerated in Title 18 U.S.C. § 1951.

3. I have been employed with the Baltimore County Police Department since December 2002 and was assigned to the Criminal Investigation Bureau as a Detective in October 2007 where I was assigned to the Economic Crimes Unit. In July 2008, I transferred to the Robbery Unit where, in November 2011, I became a Task Force Officer with the Federal Bureau of Investigation (FBI) Baltimore Violent Crimes Task Force C-3 Squad where I'm currently assigned. During my employment as a Detective/Task Force Officer, I have been assigned to investigate violations of federal law including bank robbery, kidnappings, Hobbs Act robbery, firearm violations, and other violent crime. I have training and experience in the area of criminal investigations, interview and interrogation, and evidence recovery.

4. I personally participated in the investigation of the offenses referred to in this

affidavit and have witnessed some of the facts and circumstances underlying this investigation. In addition, the statements contained in this affidavit are based in part on information and reports provided by Detectives of the Baltimore City, Baltimore County, Howard County, Prince Georges County, and Anne Arundel County Police Departments, official documents and reports reviewed in furtherance of the investigation, and on my experience and background as a Task Force Officer with the FBI. Because this affidavit is being submitted for the limited purpose of securing a criminal complaint, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts I believe are necessary to establish probable cause to believe that DAMION JORDAN and MILES GUEST have committed violations of Title 18 U.S.C. § 1951 (Hobbs Act Robbery).

PROBABLE CAUSE

5. On January 13, 2016, at approximately 11:15 a.m., two black male suspects robbed the GameStop video gaming store located at 5768 Baltimore National Pike, Catonsville, Maryland 21228. The suspects walked into the store and approached an employee at which point one of the suspects—wearing a yellow construction vest and purple construction hat—pointed a gun at the employee and demanded money from the register. The second suspect—wearing a black sweatshirt—also demanded access to the drawers behind the register in order to rob the store of video games. The suspects then ordered the employee and a male customer to the back of the store at gunpoint, where they demanded the employee give them the PlayStation 4 gaming systems. At this point, the suspects also instructed the employee and male customer to get on the floor. The victims were in fear for their lives. In total, the perpetrators robbed the store of approximately \$380.95 in U.S. Currency (representing proceeds from the store), seven PlayStation 4 gaming systems, and dozens of video games. Surveillance video recorded the

events of the robbery.

6. Upon the suspects' flight from the store, the GameStop employee called 911 emergency services to report the robbery. Baltimore County Police Officers responded to the scene. One of the responding Baltimore County Police Officers received a report from another officer of a silver Chrysler 200 traveling at a high rate of speed from the shopping mall complex where the GameStop store was located. The officer thereafter observed and followed the silver Chrysler which—upon noticing the presence of police—sped away through a stop sign and accelerated to full flight. The silver Chrysler disregarded police signals to stop and, after nearly colliding with several other motorists and pedestrians, eventually crashed into a building at 6426 Windsor Mill Road.

7. The Defendants, Damion Jordan and Miles Guest, were the sole occupants of the vehicle. The Defendants exited the vehicle after the crash and continued to flee on foot before their ultimate apprehension. At the time of his apprehension, Damion Jordan was wearing a blue sweatshirt with black sleeves consistent with the clothing worn underneath the construction vest. While Miles Guest was not wearing the black sweatshirt observed by the second perpetrator of the robbery at the time of his apprehension, he was wearing pants and shoes consistent with the clothing of the second suspect, and review of the surveillance video shows that the face of the second suspect matches that of Guest.

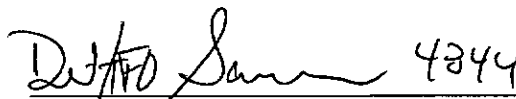
8. Later in the day of January 13, 2016, investigators sought, obtained, and executed a search warrant on the vehicle carrying the Defendants. The search revealed a silver revolver, ammunition, black masks, black trash bags, a black jacket, and gloves matching those used in the robbery that day as well as previous robberies of GameStop stores involving a similar modus operandi. Perhaps most importantly, the vehicle contained seven PlayStation 4 ("PS4") video

game consoles with serial numbers matching the seven video game consoles stolen from the GameStop only minutes earlier, as well as a plethora of unopened video games that also matched those stolen from the store.

9. The GameStop store is a commercial business located in Maryland, and engages in interstate commerce. On January 13, 2016, the Defendants affected interstate commerce inasmuch by robbing commercial goods that had traveled in interstate commerce and otherwise disrupting and harming the commercial operations of a store engaged in interstate commerce. Accordingly, DAMION JORDAN and MILES GUEST obstructed, delayed, and affected commerce in the movement of articles and commodities in commerce, and attempted to do so, by robbery, in that they unlawfully took and obtained commercial goods from persons against their will, by means of actual and threatened force, violence, and fear of injury, immediate and future, to their persons and property, by pointing a firearm and demanding commercial items and other things of value from the store.

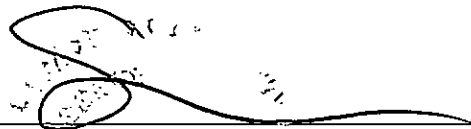
CONCLUSION

Based on the foregoing, I respectfully submit that there is probable cause to believe that **DAMION JORDAN** and **MILES GUEST** committed the aforementioned violations of Title 18, United States Code, Section 1951 (Hobbs Act Robbery).


Shane Sammons
Task Force Officer
Federal Bureau of Investigation

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Sworn to before me this 3rd day of October, 2016



The Honorable Stephanie A. Gallagher
United States Magistrate Judge